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as Trustee of SORENSEN RESEARCH AND
DEVELOPMENT TRUST

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of) Case No. 07-CV-02121-BTM-CAB
SORENSEN RESEARCH AND)
DEVELOPMENT TRUST,)

v. Plaintiff,)) **THIRD AMENDED NOTICE**
) **OF RELATED CASES**

GIANT INTERNATIONAL (USA) LTD., a Delaware corporation, and DOES 1-10,

Defendants.

GIANT INTERNATIONAL (USA) LTD., a
Delaware corporation,

Cross-Complainant.

V.

JENS ERIK SORENSEN, as Trustee of
SORENSEN RESEARCH AND
DEVELOPMENT TRUST.

Cross-Defendant

1 Pursuant to Local Civil Rule 40.1(e), Plaintiff JENS E. SORENSEN, as
2 TRUSTEE OF THE SORENSEN RESEARCH AND DEVELOPMENT TRUST
3 (“SRDT”), hereby gives THIRD AMENDED notice of cases related to the present
4 case. Specifically, SRD TRUST gives notice of the following related cases that all
5 arise from alleged infringement of United States Patent Number 4,935,184 (“the ‘184
6 patent”), whether pending, dismissed, or otherwise terminated:

7 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
8 *Trust v. Central Purchasing, LLC, et al.*, Case No. 08cv309, filed February 15, 2008
9 in the United States District Court for the District of Southern California. Plaintiff
10 alleges infringement of the ‘184 patent by Defendants. Consolidation is not
11 recommended because this related case involves different parties and has different
12 products at issue.

13 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
14 *Trust v. Logitech, Inc., et al.*, Case No. 08cv308, filed February 15, 2008 in the
15 United States District Court for the District of Southern California. Plaintiff alleges
16 infringement of the ‘184 patent by Defendants. Consolidation is not recommended
17 because this related case involves different parties and has different products at issue.

18 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
19 *Trust v. Metabo Corporation, et al.*, Case No. 08cv304, filed February 15, 2008 in
20 the United States District Court for the District of Southern California. Plaintiff
21 alleges infringement of the ‘184 patent by Defendants. Consolidation is not
22 recommended because this related case involves different parties and has different
23 products at issue.

24 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
25 *Trust v. Rally Manufacturing, Inc., et al.*, Case No. 08cv302, filed February 15, 2008
26 in the United States District Court for the District of Southern California. Plaintiff
27 alleges infringement of the ‘184 patent by Defendants. Consolidation is not
28 recommended because this related case involves different parties and has different

1 products at issue.

2 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
3 *Trust v. Sunbeam Products, Inc., et al.*, Case No. 08cv306, filed February 15, 2008 in
4 the United States District Court for the District of Southern California. Plaintiff
5 alleges infringement of the '184 patent by Defendants. Consolidation is not
6 recommended because this related case involves different parties and has different
7 products at issue.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
9 *Trust v. Star Asia, U.S.A., LLC, et al.*, Case No. 08cv307, filed February 15, 2008 in
10 the United States District Court for the District of Southern California. Plaintiff
11 alleges infringement of the '184 patent by Defendants. Consolidation is not
12 recommended because this related case involves different parties and has different
13 products at issue.

14 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
15 *Trust v. CTT Tools, Inc., et al.*, Case No. 08cv231, filed February 5, 2008 in the
16 United States District Court for the District of Southern California. Plaintiff alleges
17 infringement of the '184 patent by Defendants. Consolidation is not recommended
18 because this related case involves different parties and has different products at issue.

19 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
20 *Trust v. Global Machinery Company, et al.*, Case No. 08cv233, filed February 5,
21 2008 in the United States District Court for the District of Southern California.
22 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not
23 recommended because this related case involves different parties and has different
24 products at issue.

25 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
26 *Trust v. Emissive Energy Corp., et al.*, Case No. 08cv234, filed February 5, 2008 in
27 the United States District Court for the District of Southern California. Plaintiff
28 alleges infringement of the '184 patent by Defendants. Consolidation is not

1 recommended because this related case involves different parties and has different
2 products at issue.

3 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
4 *Trust v. Alltrade Tools, LLC., et al.*, Case No. 08cv232, filed February 5, 2008 in the
5 United States District Court for the District of Southern California. Plaintiff alleges
6 infringement of the '184 patent by Defendants. Consolidation is not recommended
7 because this related case involves different parties and has different products at issue.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
9 *Trust v. Motorola, Inc., et al.*, Case No. 3:08-cv-0136 LAB RBB, filed January 23,
10 2008 in the United States District Court for the District of Southern California.
11 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not
12 recommended because this related case involves different parties and has different
13 products at issue.

14 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
15 *Trust v. Sanyo North America Corporation, et al.*, Case No. 3:08-cv-0135 DMS
16 POR, filed January 23, 2008 in the United States District Court for the District of
17 Southern California. Plaintiff alleges infringement of the '184 patent by Defendants.
18 Consolidation is not recommended because this related case involves different
19 parties and has different products at issue.

20 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
21 *Trust v. Informatics, inc., et al.*, Case No. 3:08-cv-0134-L NLS, filed January 23,
22 2008 in the United States District Court for the District of Southern California.
23 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not
24 recommended because this related case involves different parties and has different
25 products at issue.

26 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
27 *Trust v. Ryobi Technologies, Inc., et al.*, Case No. 3:08-cv-0070-BTM-CAB, filed
28 January 11, 2008 in the United States District Court for the District of Southern

1 California. Plaintiff alleges infringement of the '184 patent by Defendants.
2 Consolidation is not recommended because this related case involves different
3 parties and has different products at issue.

4 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
5 *Trust v. Senco Products, Inc.*, Case No. 3:08-cv-0071-BTM-CAB, filed January 11,
6 2008 in the United States District Court for the District of Southern California.
7 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not
8 recommended because this related case involves different parties and has a single
9 different product at issue.

10 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
11 *Trust v. Emerson Electric Co., et al*, Case No. 3:08-cv-0060-BTM-CAB, filed
12 January 10, 2008 in the United States District Court for the District of Southern
13 California. Plaintiff alleges infringement of the '184 patent by Defendants.
14 Consolidation is not recommended because this related case involves different
15 parties and has different products at issue.

16 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
17 *Trust v. Johnson Level & Tool Mfg. Co., Inc.*, Case No. 3:08-cv-0025-BTM-CAB,
18 filed January 4, 2008 in the United States District Court for the District of Southern
19 California. Plaintiff alleges infringement of the '184 patent by Defendants.
20 Consolidation is not recommended because this related case involves different
21 parties and has different, unrelated products at issue.

22 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
23 *Trust v. Lexar Media, Inc.*, Case No. 5:08-cv-00095-JW, filed January 7, 2008 in the
24 United States District Court for the District of Northern California. Plaintiff alleges
25 infringement of the '184 patent by Defendants. Consolidation is not recommended
26 because this related case involves different parties and has different unrelated
27 products at issue.

28 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*

1 *Trust v. Ampro Tools Corporation*, Case No. 4:08-cv-00096-CW, filed January 7,
2 2008 in the United States District Court for the District of Northern California.
3 Plaintiff alleges infringement of the '184 patent by Defendants. Consolidation is not
4 recommended because this related case involves different parties and has different,
5 unrelated products at issue.

6 *PowerStation LLC, et al v. Sorensen Research and Development Trust*, Case
7 No. 07-cv-04167-RBH, filed December 31, 2007 in the United States District Court
8 for the District of South Carolina. Plaintiff seeks declaratory judgment that the '184
9 patent is invalid and not infringed by them, and also makes an unfair trade practices
10 claim. Consolidation is not recommended because case involves different parties
11 and different products, and adds a state law cause of action.

12 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development
13 Trust v. Energizer Holdings, Inc., et al*, Case No. 3:07-CV-2321-BTM-CAB, filed
14 December 11, 2007 in the United States District Court for the Southern District of
15 California. Consolidation is not recommended because this related case involves
16 different parties and has different, unrelated products at issue.

17 *Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust v.
18 Esseplast (USA) NC, Inc., et al*, Case No. 3:07-cv-2277-BTM-CAB, filed December
19 4, 2007 in this District. Consolidation is not recommended because this related case
20 involves different parties and has different, unrelated products at issue.

21 *Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust v.
22 Helen of Troy Texas Corporation, et al*, Case No. 3:07-cv-2278-BTM-CAB, filed
23 December 4, 2007 in this District. Consolidation is not recommended because this
24 related case involves different parties and has different, unrelated products at issue.

25 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development
26 Trust v. First International Digital, Inc., et al*, Case No. 3:07-cv-5525-JSW, filed
27 October 30, 2007 in the United States District Court for the Northern District of
28 California. Consolidation is not recommended because this related case involves

1 different parties and has different, unrelated products at issue.

2 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
3 *Trust v. Digital Networks North America, Inc., et al*, Case No. 3:07-5568-JSW, filed
4 November 1, 2007 in the United States District Court for the Northern District of
5 California. Consolidation is not recommended because this related case involves
6 different parties and has different, unrelated products at issue.

7 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
8 *Trust v. The Black & Decker Corporation, et al*, Civil Case No.: 3:06-CV-1572-
9 BTM-CAB, filed August 7, 2006, in the United States District Court for the Southern
10 District of California. Consolidation is not recommended because this related case
11 involves different parties and has different, unrelated products at issue.

12 *American Safety Razor Co. v. Sorensen Research & Development Trust*, Civil
13 Case No. 07-CV-00730-HHK, filed April 20, 2007, in the United States District
14 Court for the District of Columbia. Consolidation is not recommended because this
15 related case involves different parties and has different, unrelated products at issue.

16 *DMS Holdings, Inc. v. Sorensen Research & Development Trust*. Civil Case
17 No.: 07-CV-02690, filed May 11, 2007, in the United States District Court for the
18 Northern District of Illinois. Consolidation is not recommended because this related
19 case involves different parties and has different, unrelated products at issue.

20 *Jens Erik Sorensen as Trustee of the Sorensen Research And Development*
21 *Trust v. Tecnica USA, Inc and Nordica USA, Inc.*, Civil Case No. 06CV1941 B
22 MLS, filed September 18, 2006 in the Southern District of California. The action
23 was settled by the parties, and dismissed.

24 *Jens Erik Sorensen As Trustee of The Sorensen Research And Development*
25 *Trust v. Head USA Inc.* Civil Case No.: 06CV1434BTN CAB, filed July 2006 in
26 the Federal District for the Southern District of California. The action was settled by
27 the parties, and dismissed.

28 *Head USA Inc. v. Jens Erik Sorensen (As Trustee of The Sorensen Research*

1 *And Development Trust), and Sorensen Research And Development Trust.* Docket
 2 No.: 306CV00983, filed June 2006 in the Federal District of Connecticut. The matter
 3 was transferred and consolidated with the *Sorensen Research And Development*
 4 *Trust v. Head USA Inc.* action filed in the Southern District of California, Civil Case
 5 No.: 06CV1434BTM CAB. The action was later settled by the parties, and
 6 dismissed.

7 *Nordica USA Corp. v. Jens Ole Sorensen, Jens Erik Sorensen, and Sorensen*
 8 *Research and Development Trust.* Docket No. 1:06-cv-91-JM filed March 8, 2006 in
 9 the Federal District of New Hampshire. The matter was transferred and consolidated
 10 with *Jens Erik Sorensen As Trustee of The Sorensen Research And Development*
 11 *Trust v. Tecnica USA, Inc and Nordica USA, Inc.*, Civil Case No. 06CV1941 B
 12 MLS, filed in the Southern District of California. The action was later settled by the
 13 parties.

14 *Jens Ole Sorensen, and Jens E. Sorensen, as Trustee Of The Sorensen*
 15 *Research and Development Trust v. DaimlerChrysler AG, and Mercedes-Benz USA,*
 16 *LLC.* Civil No. 03-1763 (HAA) filed in the United States District Court for
 17 Northern California and transferred to the United States District Court for New
 18 Jersey. This matter has been settled and dismissed.

19 *In the Matter of Certain Automobile Tail Light Lenses And Products*
 20 *Incorporating Same.* Investigation No. 337-TA-502 filed in the United States
 21 International Trade Commission. The matter was remanded after appeal to the
 22 Federal Circuit Court of Appeals, then settled and dismissed.

23 *Jens E. Sorensen, as Trustee Of The Sorensen Research and Development*
 24 *Trust v. Premier Automotive Group, Ford Motor Company, and Jaguar, Ltd.* Case
 25 No. 03-cv-01107, filed March 14, 2003 in the Federal Court for the Northern District
 26 of California. The matter was settled and dismissed.

27 *Lowe's Companies, Inc., et al v. Sorensen Research and Development Trust.*
 28 Case No. 05-cv-00234 filed July 29, 2005 in the Federal Court for the Western

1 District of North Carolina. The matter was never served and was dismissed.

2 *Digital Innovations LLC v. Sorensen Research and Development Trust.* Case
3 No. 05-cv-06428, filed November 9, 2005 in the Federal Court for the Northern
4 District of Illinois. The matter was never served and was dismissed.

5 *Big Lots v. Sorensen Research and Development Trust.* Case No. 2:06-cv-
6 1089, filed December 29, 2006 in the Federal Court for the Southern District of
7 Ohio. The matter was never served and was dismissed.

8 *Bon-Aire v. Sorensen Research and Development Trust.* Case No. 07-cv-054-
9 S, filed January 2007 in the Federal Court for the District of Idaho. The matter was
10 never served and was dismissed.

11 *Husqvarna Outdoor Products, Inc. v. Sorensen Research and Development*
12 *Trust.* CIV. NO. CV106-160 in the Federal Court for the Southern District of
13 Georgia on October 30, 2006. The matter was never served and was dismissed.

14 *Sorensen et al v. International Trade Commission et al.* 427 F.3d 1375
15 (Fed.Cir., 2005). After the Federal Circuit ruled in patentee's favor, the parties
16 settled and dismissed.

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18 //
19 //
20 DATED this 2/26/2008

21
22 JENS ERIK SORENSEN, as Trustee of
23 SORENSEN RESEARCH AND DEVELOPMENT
24 TRUST, Plaintiff

25 /s./ Melody A. Kramer
26 Melody A. Kramer, Esq.
27 J. Michael Kaler, Esq.
28 Attorneys for Plaintiff

PROOF OF SERVICE

I, Melody A. Kramer declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600, San Diego, California, 92121. I am a member of the State Bar of California and the Bar of this Court.

On February 26, 2008, I served on the parties to this action the following documents:

THIRD AMENDED NOTICE OF RELATED CASES

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
Allison Goddard J. Christopher Jaczko Jaczko Goddard LLP 4401 Eastgate Mall San Diego, CA 92121 agoddard@jaczkogoddard.com cjaczko@jaczkogoddard.com 858-225-3500 FAX	Defendant Giant International (USA) Ltd.	Email – Pleadings Filed with the Court
Dale Lischer dlicher@sglaw.com Elizabeth G. Borland egborland@sglaw.com Kerri A. Hochgesang khochgesang@sglaw.com Smith, Gambrell & Russell, LLP Promenade II, Suite 3100 1230 Peachtree St., N.E. Atlanta, GA 30309 404-685-6945 FAX	Defendant Giant International (USA) Ltd.	Email – Pleadings Filed with the Court

- (Personal Service) I caused to be personally served in a sealed envelope hand-delivered to the office of counsel during regular business hours.
- (Federal Express) I deposited or caused to be deposited today with Federal Express in a sealed envelope containing a true copy of the foregoing documents with fees fully prepaid addressed to the above noted addressee for overnight delivery.

(Facsimile) I caused a true copy of the foregoing documents to be transmitted by facsimile machine to the above noted addressees. The facsimile transmissions were reported as complete and without error.

█ (Email) I emailed a true copy of the foregoing documents to an email address represented to be the correct email address for the above noted addressee.

(Email--Pleadings Filed with the Court) Pursuant to Local Rules, I electronically filed this document via the CM/ECF system for the United States District Court for the Southern District of California.

I declare that the foregoing is true and correct, and that this declaration was executed on Tuesday, February 26, 2008, in San Diego, California.

/s/ Melody A. Kramer

Melody A. Kramer